

U.S. Department of Justice

Washington, DC 20530

**Registration Statement****Pursuant to the Foreign Agents Registration Act of  
1938, as amended****I--REGISTRANT**

## 1. Name of Registrant

Ruder Finn, Inc.

## 2. Registration Number (To be assigned by the FARA Unit)

6840

## 3. Primary Business Address

425 East 53rd Street, New York City, NY 10022

## 4. If the registrant is an individual, furnish the following information:

(a) Residence address(es)

(b) Nationality

(c) Year of birth

(d) Present citizenship

(e) If present citizenship not acquired by birth, state when, where and how acquired

(f) Occupation

## 5. If the registrant is not an individual, furnish the following information:

(a) Type of organization: Committee ☐ Association ☐ Partnership ☐ Voluntary group ☐  
Corporation ☒ Other (*specify*) \_\_\_\_\_

(b) Date and place of organization 05/29/2001, New York

(c) Name of responsible individual Kathy Bloomgarden  
(e.g., officer, director or partner)(d) Other business address(es), if any, including See Appendix for Response  
locations of branch or local offices

(e) If a membership organization, provide number of members

(f) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address	Citizenship	Position
Kathy Bloomgarden	1043 North Avenue New Rochelle, NY 10804	UNITED STATES	CEO
Peggy Walsh	55 Dirksen Drive Wilton, CT 06897	UNITED STATES	CFO
Michael Schubert	43 Sidney Place Brooklyn, NY 11201	UNITED STATES	CIO

(g) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Name	Foreign Principal(s)	Services
See Appendix for Response		

(h) Describe the nature of the registrant's regular business or activity.

Public relations

(i) Give a complete description of the ownership and control structure of the registrant.

Ruder Finn, Inc is 100% owned by Ruder Finn, Group Inc which in turn is 100% owned by Kathy Bloomgarden, a U.S citizen, her immediate family and other family interests

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6. List all individuals, other than those listed in Item 5(g), who render services or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address	Foreign Principal(s)	Services
See Appendix for Response			

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## II--FOREIGN PRINCIPAL

7. List every foreign principal<sup>1</sup> for whom the registrant is acting or has agreed to act.

Foreign Principal  
NEOM Company

Foreign Principal Address  
Information Technology and Communications Complex,  
2nd Floor Bldng IN- 01, Al Nakheel District 12382  
Riyadh  
SAUDI ARABIA 11411

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## III--ACTIVITIES

8. In addition to the activities described in any Exhibit B to this statement, will the registrant engage or is the registrant engaging now in activity or rendering services on its own behalf which benefits any or all of its foreign principals?

Yes ☐

No ☒

If yes, describe fully.

Foreign Principal

Activities/Services

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## IV--FINANCIAL INFORMATION

### 9. (a) RECEIPTS-MONIES

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>2</sup> under FARA, has the registrant received from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income, or money either as compensation, or for disbursement or otherwise?

Yes ☐

No ☒

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.<sup>3</sup>

Foreign Principal	Date Received	From Whom	Purpose	Amount
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Total

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<sup>1</sup> The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual.

<sup>2</sup> An agent must register within 10 days of becoming an agent, and before acting as such.

<sup>3</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, monies, or other things of value for a foreign principal, as part of a fundraising campaign. There is no printed form for this exhibit. (See Rule 201(e), 28 C.F.R. § 5.201(e)).

**(b) RECEIPTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>4</sup> under FARA, has the registrant received anything of value<sup>5</sup> other than money, from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
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**10. (a) DISBURSEMENTS-MONIES**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>6</sup> under FARA, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Item 7 of this statement or transmitted monies to any such foreign principal?

Yes ☐No ☒

If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount
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**(b) DISBURSEMENTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>7</sup> under FARA, has the registrant disposed of any thing of value<sup>8</sup> other than money in furtherance of or in connection with its activities on behalf of any foreign principal named in Item 7 of this statement? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
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**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>9</sup> under FARA, has the registrant (or any short form registrant) made any contribution of money or other thing of value from its own funds and on its own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes ☐ No ☒

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
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4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 Things of value include but are not limited to gifts, interest-free loans, expense-free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks", and the like.

**V--INFORMATIONAL MATERIALS<sup>10</sup>**

11. Prior to the time of filing this statement,<sup>11</sup> has the registrant prepared, disseminated, or caused to be disseminated, any informational materials on behalf of any foreign principal listed in Item 7 of this statement?

Yes ☐ No ☒

If yes, identify each foreign principal and attach the informational materials.

Foreign Principal	Informational Materials Attached	Type
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12. (a) Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials?

Yes ☒ No ☐

- (b) If yes, identify each foreign principal and respond to the remaining items in this section.

NEOM Company

13. Has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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14. Will any individuals or organizations, including public relations firms or publicity agents, participate in the preparation or dissemination of such informational materials?

Yes ☐ No ☒

If yes, furnish the names and addresses of such individuals or organizations.

Name	Address	Foreign Principal(s)
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15. Activities in preparing or disseminating informational materials will include the use of the following:

- |   |  |  |   |
|---|--|--|---|
| <input type="checkbox"/> Magazine or newspaper                              | <input checked="" type="checkbox"/> Advertising campaigns  | <input checked="" type="checkbox"/> Press releases       | <input checked="" type="checkbox"/> Pamphlets or other publications |
| <input checked="" type="checkbox"/> Lectures or speeches                    | <input checked="" type="checkbox"/> Radio or TV broadcasts | <input checked="" type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams                       |
| <input checked="" type="checkbox"/> Email                                   |  |  |   |
| <input checked="" type="checkbox"/> Website URL(s): <u>TBD</u>              |  |  |   |
| <input checked="" type="checkbox"/> Social Media website URL(s): <u>TBD</u> |  |  |   |
| <input type="checkbox"/> Other (specify) _____                              |  |  |   |

<sup>10</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, electronic communications, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

<sup>11</sup> See Footnote 2, on page 3.

16. Informational materials will be disseminated among the following groups:

- |  |  |
|--|--|
| <input type="checkbox"/> Public officials      | <input checked="" type="checkbox"/> Civic groups or associations |
| <input type="checkbox"/> Legislators           | <input type="checkbox"/> Libraries                               |
| <input type="checkbox"/> Government agencies   | <input type="checkbox"/> Educational groups                      |
| <input checked="" type="checkbox"/> Newspapers | <input checked="" type="checkbox"/> Nationality groups           |
| <input checked="" type="checkbox"/> Editors    | <input type="checkbox"/> Other ( <i>specify</i> ) _____          |

17. Indicate the language to be used in the informational materials:

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> English | <input checked="" type="checkbox"/> Other ( <i>specify</i> ) <u>Arabic</u> |
|---|--|

## VI--EXHIBITS AND ATTACHMENTS

18. (a) The following described exhibits shall be filed with a Registration Statement:

*Exhibit A-* This exhibit, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal named in Item 6.

*Exhibit B-* This exhibit, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

(b) An Exhibit C shall be filed when applicable. This exhibit, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530. (See Rule 201(c) and (d)).

(c) An Exhibit D shall be filed when applicable. This exhibit, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal. (See Rule 201 (e)).

## VII--EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Registration Statement, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature<sup>12</sup>

06/17/2020

Ian Glover

/s/Ian Glover

<sup>12</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

U.S. Department of Justice

## Registration Statement

Washington, DC 20530

OMB No. 1124-0001 Expires May 31, 2020

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Registration Statement, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

6/16/2020

Ian Glover



## Appendix

### Response to Item 5(d)

**Item 5(d): If the registrant is not an individual, furnish the following information: Other business address(es), if any, including locations of branch or local offices.**

165 Passaic Avenue, Fairfield, NJ 07004

The Salisbury, 29 Finsbury Circus, London, UNITED KINGDOM EC2M 7AQ

141 Tompkins Ave, Suite 302, Pleasantville, NY 10570

114 Lavender Street, #14-01 CT Hub 2, Singapore, SINGAPORE 338729

Publika Solaris Dutamas, B2-3A-2, Kuala Lumpur, Selangor, MALAYSIA 50000

35 Dongzhimenwai Main Street, E101, East Lake Villas, Beijing, CHINA 100027

10 Huaxia Road, Unit A, Room 2501, Guangzhou, Guangdong, CHINA 510623

45, North Caoxi Road, 9th Floor Base Building, Shanghai, CHINA 200030

128 Gloucester Road, 24/F, Neich Tower, Hong Kong, HONG KONG

Tower A, 10th floor Emaar Digital Greens,, Sector 61, Gurgaon, INDIA 122102



## Appendix

### Response to Item 5(g)

**Item 5(g): If the registrant is not an individual, furnish the following information: Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?**

Person	Foreign Principal(s)	Services
Kathy Bloomgarden	NEOM Company	As described in the agreement attached to Exhibit B, the registrant will engage in the following activities for the foreign principal: 1) Social Media Management 2) Programs Brand strategy 3) Programs Visual identity development 4) Website Development 5) Website design 6) Website management 7) Filming services to promote and tell the story of CSR initiatives

## Appendix

### Response to Item 6

**Item 6: List all individuals, other than those listed in Item 5(g), who render services or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical, secretarial, or in a related or similar capacity.**

<b>Name</b>	<b>Residence Address</b>	<b>Foreign Principal(s)</b>	<b>Nature of Services</b>
Brian Laird	333 W 56th Street, #PHB New York City, NY 10019 425 East 53rd Street New York City, NY 10022	NEOM Company	As described in the agreement attached to Exhibit B, the registrant will engage in the following activities for the foreign principal: 1) Social Media Management 2) Programs Brand strategy 3) Programs Visual identity development 4) Website Development 5) Website design 6) Website management 7) Filming services to promote and tell the story of CSR initiatives
Brianna Rabe	3001 Warrington Road Shaker Heights, OH 41120 425 East 53rd Street New York City, NY 10022	NEOM Company	As described in the agreement attached to Exhibit B, the registrant will engage in the following activities for the foreign principal: 1) Social Media Management 2) Programs Brand strategy 3) Programs Visual identity development 4) Website Development 5) Website design 6) Website management 7) Filming services to promote and tell the story of CSR initiatives